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Attorneys for Defendants, COUNTY OF LOS ANGELES;
KAREN LA; SANDRA CHAVEZ;
WENDY CONTRERAS; JULIET MACIAS;
LINDA FLORES; VERONICA BETANCOURT-PEREZ;
ARNESHA ALLEN; BERNADETTE HENLEY;
JUDY THOMAS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

| | | |
|---------------------------------|---|----------------------------------|
| SUSAN SCHOFIELD, an individual, |) | Case No.: 2:22-CV-04332-JGB (AS) |
| |) | |
| Plaintiffs, |) | DECLARATION OF JENNIFER E. |
| vs. |) | GYSLER RE OSC RE FAILURE OF |
| |) | JUDY THOMAS TO FILE A CASE |
| COUNTY OF LOS ANGELES, et al. |) | MANAGEMENT REPORT |
| |) | |
| Defendants. |) | |
| |) | |
| |) | |
| |) | |

DECLARATION OF JENNIFER E. GYSLER
RE OSC RE CASE MANAGEMENT STATEMENT OF JUDY THOMAS

I, Jennifer E. Gysler, hereby declare

I am an attorney at law duly licensed to practice before the Courts of this
State including the Central District. My firm represents the County of Los Angeles
and its employees named in this action, including KAREN LA; SANDRA

Case Management Report

1 CHAVEZ; WENDY CONTRERAS; JULIET MACIAS; LINDA FLORES;
2 VERONICA BETANCOURT-PEREZ; ARNESHA ALLEN; BERNADETTE
3 HENLEY and JUDY THOMAS. If called upon to do so, I would and could
4 competently testify to the following facts which are within my own personal
5 knowledge.
6

- 7 1. I was assigned to defend the County of Los Angeles in this action, along
8 with its current employees named in the case, Karen La, Sandra Chavez,
9 Wendy Contreras, Juliet Macias, Linda Flores, Veronica Betancourt-Perez,
10 Arnesha Allen and Bernadette Henley. All of these individuals are social
11 workers and/or supervisors with the Department of Children & Family
12 Services.
13
14
- 15 2. Ms. Thomas was also named in the lawsuit. She had also been employed by
16 the County of Los Angeles, Department of Children & Family Services at
17 the time of the events alleged in the complaint. However, she had retired
18 from the County of Los Angeles by the time the complaint was filed. I made
19 efforts to reach her after being contacted by Ms. Susan Schofield who was
20 trying to locate and serve her. It was my goal to contact Ms. Thomas and
21 request that she allow me service on her behalf. Locating Ms. Thomas
22 proved more difficult than expected. Eventually I was able to file and
23 Answer on her behalf on December 21, 2022.
24
25

- 1 3. Since that time, I filed a Petition to obtain the relevant Juvenile Court /
2 DCFS records from the Juvenile Court. The petition is still pending. Once
3 granted, I will share all records received with the parties herein. I have been
4 working in cooperation with Ms. Schofield in this regard.
5
- 6 4. On January 21, 2023, I received this Honorable Court's Order that Ms.
7 Thomas should file a Case Management Report no later than March 1, 2023.
8 I work in a small office with myself and one partner (Jon Monroy), having
9 lost our third partner to cancer (Mr. Averbuck) a few years ago. At the time,
10 we were preparing to start trial in a civil rights matter involving the
11 Coroner's Office, our client, which was a long cause matter and required the
12 review of thousands of pages of exhibits and preparing the six individually
13 named defendants we represent. I was so focused on that matter that I
14 neglected to calendar the deadline to file a Case Management Statement on
15 behalf of Ms. Thomas.
16
- 17 5. When I received this Honorable Court's OSC for failure to file the Case
18 Management Statement on behalf of Ms. Thomas, I was extremely
19 embarrassed and horrified. It is not our custom to ignore Court Orders and I
20 apologize to this Honorable Court for my oversight.
21
- 22 6. Simultaneous with this declaration, I am filing the Case Management
23 Statement on behalf of Ms. Thomas and will not let this happen again.
24
25

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on this 18th day of May, 2023.

3
4 Jennifer E. Gysler

5 Jennifer E. Gysler, declarant.

PROOF OF SERVICE
STATE OF CALIFORNIA – COUNTY OF LOS ANGELES
CCP 1013(A)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 200 Lindero Canyon Road, Suite 204, Westlake Village, CA 91362.

On May 18, 2023, I caused to be served the foregoing document described as on the interested parties in this action as follows:

DECLARATION RE OSC RE CASE MANAGEMENT REPORT BY DEF JUDY THOMAS

☐ **By telecopier:** By transmitting an accurate copy via telecopy to the person and telephone number as follows:

☒ by placing ☐ the original ☐ a true copy thereof enclosed in sealed envelopes addressed as follows:

Susan Schofield
25001 Magic Mountain Pkwy, #620
Valencia, CA 91355

Nemecsek & Cole per ECF System

☒ per ECF System

☒ **BY MAIL:**

☐ I deposited such envelope in the mail at Westlake Village, California. The envelope was mailed with postage thereon fully prepaid.

☒ As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under the practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Westlake Village, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand, to addressee or offices of addressee.

☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 18, 2023, at Westlake Village, California.

Jennifer Gysler

Jennifer Gysler